EXCEPTION REPORT #14

Observation #94 (Issues 94.1 and 94.2) stated that Bell Atlantic-Massachusetts' (BA-MA) process for implementing, documenting and tracking metrics change proposals is inadequate and incomplete. BA-MA's response to this observation does not allow for an adequate retest of the metrics change control process.

Issue 14.1

KPMG has encountered several instances of inconsistent adherence to the Provisioning metrics change management process, particularly implementation, documentation and tracking of changes. BA-MA altered the Provisioning computer code and algorithms on numerous occasions from December 1999 through February 2000 and failed to issue clear and complete change control requests in its global tracking register and notify KPMG of all changes.

The numerous changes to Provisioning algorithms has hindered KPMG's replication efforts. KPMG validated all Provisioning metrics for February 2000, however, when applying the February code to calculate January metrics, KPMG could not replicate 33 metrics values. Again, after validating all January metrics, KPMG applied the January code to calculate December metrics and failed to replicate 40 metrics.

Issue 14.2

KPMG encountered several instances of undocumented changes in the algorithms used for Pre-Ordering metrics calculation (specifically the PO-1 family). KPMG found that BA-MA changes are often imbedded in PERL or Visual Basic programming codes and not documented on a higher level understood by a non-technical audience. Additionally, KPMG did not receive timely and complete notification of changes.

While KPMG and BA-MA metrics values agree for February 2000, KPMG encountered validation difficulties for January 2000 and December 1999 when reviewing the BA-MA algorithms. For instance, in February 2000, BA-MA altered the script names used to identify particular transaction types (Customer Service Request, Due Date Availability, etc.) only in its PERL programming code. BA-MA did not document these changes in either a higher-level algorithm or in its Global Tracking Register. The following table provides an extensive account of the differences between the algorithms used in December 1999 and February 2000:

Metric Number	Metric Description	BA-MA December Script Name	BA-MA February Script Name
PO-1-01 Retail	Customer Service Record - EDI	"ICRIS_SYR"	"BOSS_NE"
		"CSR_NY"	"CSR"
PO-1-02 Retail	Due Date Availability - EDI	"SOP_NY"	"SOP_NE"
		"WLU_NY"	"WLU_MA"
PO-1-03 Retail	Address Validation - EDI	"LWG_XA3RAG20"	"LWG_XA3RAJ20"
		"ADDRVRFY_BX"	"ADDRVRFY_MA"
		"PREMIS_NY"	"LWG_XA3RAJ20"
		"REQPREM"	"ADDRVRFY_MA"
PO-1-04 Retail	Product & Service Availability – EDI	"ICRIS_SYR"	"BOSS_NE"
		"BCO_NY"	"BCO"
PO-1-05 Retail	Telephone Number Availability & Reservation – EDI	"PREMIS_NY"	"LWG_XA3RAJ20"
		"REQTNS"	"TN_SELECT_MA"
		"LWG_XA3RAG20"	"LWG_XA3RAJ20"
		"TN_SELECT_BX"	"TN_SELECT_MA"
PO-1-07 Retail	Rejected Query – EDI	"REJCSR_NY"	"BOSS_NE" "REJCSR_MA"
PO-1-09 Retail	Parsed CSR – EDI	"ICRIS_SYR"	"BOSS_NE"
		"CSR_NY"	"CSR"

Assessment

The substantial changes to BA-MA algorithms are not clearly documented and such modifications have hindered KPMG's replication efforts. CLECs may be adversely impacted by the inconsistent implementation and tracking, and inadequate notification processes, for changes to Pre-Order Metrics calculation algorithms.